

Mitigation, Commitments, and Recommendations

In the mitigation section of an EIS, *all* mitigation, commitments, and recommendations for the project should be stated. The mitigation should be kept in two parts: (1) mitigation that includes hard commitments and (2) mitigation that will be considered further during design with no firm commitment. The mitigation section should include all commitments/mitigation as well as alterations that have been made to avoid or minimize impacts to historic resources, Section 4(f) resources, Section 6(f) resources, wetlands, other sensitive environmental concerns, and any commitments made in a Memorandum of Understanding. For example, a statement could be made such as, “A 2.4 acre palustrine forested wetland exists on the south side of the roadway. Side slopes have been changed from 4:1 to 2:1 to avoid impacting these wetlands. Should the right-of-way increase in design and thus cause impacts to this wetland, additional alternatives will have to be investigated to avoid or, at the very least, minimize impacts to the wetland.”

A clear statement as to whether or not any archaeological work remains to be done for the project must be included in this section as well. If true, a statement should be made such as, “All archaeological work has been completed for this project. Site 12D325 was determined to be eligible for the National Register of Historic Places. Consequently, the road has been slightly realigned to the south to avoid impacting Site 12D325.” In some instances, some archaeological work remains to be done. In this situation, specific work that must be completed should be described and each site referenced by its archaeological site number. For example, Phase 2 test excavation is to be conducted at Site 12Sp972, and Phase 1b survey is required at Site 12Du637 prior to construction.

After an environmental document has received FHWA approval, the mitigation, commitments, and recommendations from the study will be incorporated into the design and construction phases of project development. Commitments made in the environmental document are to be included in the design summary and plans. The project plans and the design summary are reviewed by the designer for consistency with the environmental document. The project is again reviewed for mitigation measures prior to letting. At this time, a listing of the commitments made in the environmental study, design summary, and mitigation memorandum, is provided to the appropriate highway district office along with copies of the studies. These documents are then forwarded to the project engineer.

To ensure environmental commitments and recommendations are incorporated into the design and construction phases of projects, a separate [Environmental Commitments Summary](#) sheet must be submitted with the environmental document. It is to be included separately with a brief description of the commitments and a reference to specific pages of the environmental document for details. This Environmental Commitments Summary sheet should consist of two sections. The first section lists commitments made by the time of the approval of the environmental document that must be incorporated into the project. The second section is a list of commitments that are to be considered during later phases of the project. Additionally, a statement needs to be added to this section that describes the average right-of-way approved in the environmental study. A comment such as “deviation from this standard right-of-way width will require additional environmental review” should also be included to alert the designer of the limits of the environmental study.

Environmental Commitments Sheet

Des. No.:	
Project No.:	
County:	
Description:	
Project Termini:	
Average R/W Width:	

Committed Items: (If implementation is not possible, section that made commitment must document review.)	Implemented: Yes/No (reason)
Items for further consideration: (Designer or other responsible party must briefly describe implement response.)	Implemented: Yes/No (reason)

Commitments by Environmental Assessment by:	
Evaluated and/or Modified/Updated by Design by:	
Evaluated and/or Modified/Updated by Land Acquisition by:	
Final Design Evaluation and Preparation for Construction by:	
All Commitments have been Incorporated into the Project (PE/S):	